REMARKS

I.   **INTRODUCTION**

Claims 2,3 and 21 have been cancelled. Claims 1, 4-20 and 22-38 are pending in the present application. Claims 1, 4, 20, 22 and 34-37 have been amended to more clearly point out, and distinctly claim that which is the subject matter of the invention. No new matter has been added. In view of the above amendments and the following remarks, it is respectfully submitted that all of the presently pending claims are allowable.

II.   **INFORMATION DISCLOSURE STATEMENT**

The Examiner stated that the information disclosure statement filed on January 19, 2001 failed to comply with 37 C.F.R. 1.98(a)(1). Included with this response is a copy of the information disclosure statement form, the 1449 form and the listed references that were originally submitted with the application. The Applicant respectfully requests that the Examiner consider the references.

III. THE 35 U.S.C. § 112 REJECTIONS SHOULD BE WITHDRAWN

The Examiner has rejected claim 22 under 35 U.S.C. § 112, second paragraph as being for failing to particularity point out and distinctly claim that which is the subject matter of the invention. The phrase "implied features" recited in claim 22 has been replaced with the phrase "user-created features." The support for this amendment is found in the Specification on page 21, where "implied features" are described as "when the user changes the way the source file is used." In view of this amendment, it is respectfully requested that the Examiner withdraw his rejection of claim 22, and claim 4, which recites similar subject matter and has been similarly amended.

IV. THE 35 U.S.C. § 103(a) REJECTIONS SHOULD BE WITHDRAWN

The Examiner has rejected claims 1-38 under 35 U.S.C. § 103(a) as unpatentable over U.S. Pat. No. 5,739,512 to Fong et al. ("the Fong patent"). (See 4/26/04 Office Action, para. 7, page 3).

The Fong patent describes a method for providing a graphical user interface for creating and editing a mapping of structured information to different structured information. (See the Fong patent, Abstract). A Standard Generalized Markup Language (SGML) document is transformed into a HyperText Markup Language (HTML) document by using a SMGL Document Type Definition (DTD) and a mapping rule of the SGML to HTML. (See the Fong patent, col.7, lines 3-14). As an example of the method, a parser recognizes a line 66 of the SGML document (Fig. 1C). (See the Fong patent, col. 8, lines 66-67). A transformer utilizes a line 46 of the mapping rule (Fig. 1B) to output a relevant HTML tag, shown as <P>, in a line 88 of the HTML document. (See the Fong patent, col. 9, lines 1-3). A text statement in the line 66 is then recognized by the parser and output to the line 88 of the HTML document. (See the Fong patent, col. 9, lines 3-4). An SGML end tag is recognized in the SGML document, and the parser outputs an HTML end tag, shown as

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</P, in the line 88 of the HTML document. (See the Fong patent, col. 9, lines 5-7). There is no disclosure regarding assembling the SGML tags in a buffer before writing the tags to the HTML document.

The Examiner has stated the grounds for rejection with respect to claim 20, and as such, Applicant will direct the remarks to that claim. As amended, claim 20 recites a method for translating a file from a source format to a target format comprising "identifying a feature set of a source file" and "*assembling the feature set in a buffer*" in combination with "writing the feature set into a target file in the target format." Applicant has stated that prior art translators do not permit a user to translate multiple input formats to multiple output formats, because those translators use a one-to-one mapping of statements in one language to statements in another language. (See Specification, page 3, lines 5-25). This one-to-one approach is the method of the Fong patent. In contrast, Applicant has overcome this compiler-like approach to translation by identifying a feature set of a source file, *assembling the feature set in a buffer*, and writing the feature set into a target file in a target format. (See Specification, page 7, lines 25-32). Rather than using a line-by-line approach as the prior art, the present invention allows the target file to be written in a tree-structure format. (See Specification, page 7, lines 31-32).

The Examiner has pointed to Fig. 8A-1 as disclosing the claimed step of "assembling the feature set in a buffer." The Fong patent describes Fig. 8A-1 as "a map class structure for the map module." (See the Fong Patent, col. 4, lines 47-49). Initially, it should be noted that there is no disclosure in the Fong patent regarding buffers or any temporary storage objects that would act to assemble the feature set. Furthermore, the use of "stringBuffer" appears to be a data type of the variable AtrDTDName, as is further evidenced by the data type bool immediately below. (See the Fong patent, Fig. 8A-1; col. 13, lines 1-43). There is no disclosure or suggestion that the stringBuffer is used to assemble the feature set. Therefore, it is respectfully submitted that the Fong patent does not disclose or suggest the step of "assembling the feature set in a buffer," as recited in claim 20.

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It is respectfully submitted that claim 20 is not unpatentable over the Fong patent for the reasons discussed above and that this rejection should be withdrawn. Because claims 22-33 depend from and, therefore, include all of the limitations of claim, it is respectfully submitted that these claims are also allowable. Independent claims 20, 1 and 34-38 include substantially the same limitations, it is respectfully submitted that these claims are allowable for at least the reasons stated above. Specifically, claims 1 and 35 recite, "a buffer to assemble the feature set." Claim 34 recites, "providing a buffer to assemble the feature set." Claims 36 and 37 recite, "computer readable program code for assembling the feature set." Claim 38 recites, "a buffer to store the feature set." Because claims 4-19 depend from and, therefore, include all of the limitations of claim 1, it is respectfully submitted that these claims are also allowable.
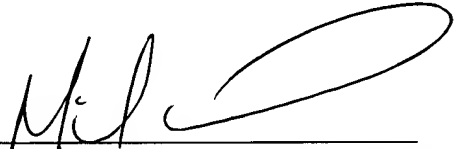
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Furthermore, with regard to independent claim 38, the Fong patent does not disclose or suggest the translation of "a source file in an MIF format to a target file in an HTML format." The Fong patent discloses the translation of structured formats such as markup languages, database information formats, and naming schemes. (See the Fong patent, col. 2, lines 51-54). MIF is a format used to describe a hardware or a software component, which is dissimilar from the formats disclosed in the Fong patent. Translations from MIF format to HTML are neither disclosed nor suggested in the Fong patent, and one of ordinary skill in the art could not use the disclosure of the Fong patent to perform such a translation. Therefore, it is respectfully requested that the Examiner withdraw the rejection of claim 38, because the Fong patent does not disclose or suggest translation of "a source file in an MIF format to a target file in an HTML format" or "a buffer to store the feature set."

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V.   CONCLUSION

In light of the foregoing, Applicant respectfully submits that all of the now pending claims are in condition for allowance. All issues raised by the Examiner having been addressed, and an early and favorable action on the merits is earnestly solicited.

Respectfully submitted,

Dated: September 27, 2004

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